

Department of Energy

Ohio Field Office Fernald Environmental Management Project P. O. Box 538705 Cincinnati. Ohio 45253-8705 (513) 648-3155



"AUG 1 9 2004

Mr. James A. Saric, Remedial Project Manager United States Environmental Protection Agency Region V, SR-6J 77 West Jackson Boulevard Chicago, Illinois 60604-3590

DOE-0377-04

Mr. Tom Schneider, Project Manager Ohio Environmental Protection Agency 401 East 5th Street Dayton, Ohio 45402-2911

Dear Mr. Saric and Mr. Schneider:

TRANSMITTAL OF RESPONSES TO THE UNITED STATES ENVIRONMENTAL PROTECTION AGENCY COMMENTS AND THE FINAL AREA 9, PHASE III ABANDONED **OUTFALL LINE PART ONE EXCAVATION PLAN, EXCAVATION CONTROL PROJECT** SPECIFIC PLAN, CERTIFICATION DESIGN LETTER, AND PROJECT SPECIFIC PLAN FOR **CERTIFICATION SAMPLING**

- References: 1) Letter DOE-0363-04, W. Taylor to J. Saric/T. Schneider, "Transmittal of Responses to Ohio Environmental Protection Agency Comments on the Draft Certification Design Letter and Project Specific Plan for Certification Sampling for Area 9, Phase III Abandoned Outfall Line - Part One," dated August 11, 2004
 - 2) Letter DOE-0369-04, W. Taylor to J. Saric/T. Schneider, "Transmittal of Responses to Ohio Environmental Protection Agency Comments on the Draft Area 9, Phase III Abandoned Outfall Line Excavation Plan Part One, Revision B," dated August 11, 2004
 - 3) Letter, J. Saric to J. Reising, "A9 P3 Part One CDL," dated August 12, 2004
 - 4) Letter, J. Saric to J. Reising, "A9 P3 Part One Certification Sampling PSP," dated August 12, 2004

"AUG 1 9 2004

Mr. James A. Saric Mr. Tom Schneider -2-

DOE-0377-04

- 5) Letter, J. Saric to J. Reising, "A9 P3 Part One Excavation Plan," dated August 12, 2004
- Letter, J. Saric to J. Reising, "A9 P3 Part One Excavation Control PSP," dated August 12, 2004
- 7) Letter, T. Schneider to W. Taylor, "Approval RTC on the Draft CDL and PSP for Certification Sampling for A9PIII AOL-Part 1," dated August 17, 2004
- 8) Letter, T. Schneider to W. Taylor, "Approval RTC on the Draft A9PIII AOL Excavation Plan, Part One," dated August 17, 2004

Enclosed for your approval are responses to the United States Environmental Protection Agency (USEPA) comments and the following final documents:

- Area 9, Phase III Abandoned Outfall Line Excavation Plan Part One, Rev. 0
- Project Specific Plan for Excavation Control of Area 9, Phase III (Supplement to 20300-PSP-0011)
- Certification Design Letter for Area 9, Phase III Abandoned Outfall Line Part One, Rev. 0
- Project Specific Plan for Area 9, Phase III Certification Sampling Part One, Rev. 0

Both the USEPA and Ohio Environmental Protection Agency (OEPA) comment responses have been incorporated into these final documents and conditional approvals have been received per the above-noted references.

If you have any questions or require additional information, please contact Johnny Reising at (513) 648-3139.

Sincerely,

FCP:Reising

William J (Taylor Director

- 1.5 1.5

Enclosures: As Stated

Mr. James A. Saric Mr. Tom Schneider -3-

DOE-0377-04

cc w/enclosures:

- J. Reising, OH/FCP
- T. Schneider, OEPA-Dayton (three copies of enclosure)
- G. Jablonowski, USEPA-V, SR-6J
- F. Bell, ATSDR
- M. Cullerton, Tetra Tech
- M. Shupe, HSI GeoTrans
- R. Vandegrift, ODH

AR Coordinator, Fluor Fernald, Inc./MS78

cc w/o enclosures:

- N. Akgündüz, OH/FCP
- K. Johnson, OH/FCP
- R. Abitz, Fluor Fernald, Inc./MS64
- K. Alkema, Fluor Fernald, Inc./MS01
- L. Barlow, Fluor Fernald, Inc./MS41
- J. Chiou, Fluor Fernald, Inc./MS64
- M. Frank, Fluor Fernald, Inc./MS64
- W. Hooper, Fluor Fernald, Inc./MS60
- U. Kumthekar, Fluor Fernald, Inc./MS64
- S. Lorenz, Fluor Fernald, Inc./MS41
- G. Lupton, Fluor Fernald, Inc./MS64
- F. Miller, Fluor Fernald, Inc./MS64
- D. Nixon, Fluor Fernald, Inc./MS01
- T. Poff, Fluor Fernald, Inc./MS65-2
- D. Powell, Fluor Fernald, Inc./MS64
- T. Snider, Fluor Fernald, Inc./MS64
- ECDC, Fluor Fernald, Inc./MS52-7

RESPONSES TO UNITED STATES ENVIRONMENTAL PROTECTION AGENCY COMMENTS ON AREA 9 PHASE III ABANDONED OUTFALL LINE EXCAVATION PLAN PART ONE REVISION B

FERNALD CLOSURE PROJECT FERNALD, OHIO

AUGUST 2004

U.S. DEPARTMENT OF ENERGY

RESPONSES TO UNITED STATES ENVIRONMENTAL PROTECTION AGENCY COMMENTS ON AREA 9, PHASE III ABANDONED OUTFALL LINE **EXCAVATION PLAN PART ONE, REVISION B**

SPECIFIC COMMENTS

Commenting Organization: U.S. EPA 1.

Commenter: Saric

Section #: 1.2

Pg #: 1-2

Line #: 11 through 23

Code: C

Original Specific Comment #: 1

Comment:

The text states that the remediation of the abandoned outfall line located in Area 9 Phase III will be conducted in three phases. However, the document is confusing because the terms "Phase I" and "Part I" are used inconsistently when discussing the west section of the abandoned outfall line that will be remediated. The certification design letter and the project specific plan for Area 9, Phase III Part One certification sampling use the term "Part I" when discussing the west section oft eh abandoned outfall line. The text in the excavation plan

should be revised to use the term "Part I" consistently.

Response:

Sequencing Phases will be changed to sequencing Parts (e.g., Part One).

Action:

The document will be edited to change sequencing Phases to Parts. The designation for

Area 9, Phase III will remain unchanged.

Pg #: 1-3

Commenting Organization: U.S. EPA 2. Section #: Figure 1-1

Commenter: Saric

Line #: Not Applicable

Code: C

Original Specific Comment #: 2

Comment:

Figure 1-1 uses the terms "Phase I, II, and III" to describe the sections of the abandoned outfall that will be remediated. Figure 1-1 should be revised to use the terms "Part I, II and III."

Response:

Agree

Action:

Figures throughout the document will be modified to reflect the change from sequencing

Phases to Parts.

Commenting Organization: U.S. EPA 3.

Commenter: Saric

Pg #: 1-2 Line #: 11 through 23 Code: C

Original Specific Comment #: 3

Comment:

Section #: 1.2

The text incorrectly references Section 3.3.7 instead of Section 3.3.8. The text should be

revised accordingly.

Response:

Agree

Action:

Correction will be made in the referenced section.

RESPONSES TO U.S. ENVIRONMENTAL PROTECTION AGENCY TECHNICAL COMMENTS ON PROJECT SPECIFIC PLAN FOR AREA 9, PHASE III CERTIFICATION SAMPLING ABANDONED OUTFALL LINE – PART ONE REVISION B

FERNALD CLOSURE PROJECT FERNALD, OHIO

AUGUST 2004

U.S. DEPARTMENT OF ENERGY

RESPONSES TO U.S. ENVIRONMENTAL PROTECTION AGENCY TECHNICAL COMMENTS ON PROJECT SPECIFIC PLAN FOR AREA 9, PHASE III CERTIFICATION SAMPLING ABANDONED OUTFALL LINE - PART ONE **REVISION B**

SPECIFIC COMMENTS

1. Commenting Organization: U.S. EPA

Commenter: Saric

Section #: 2.3.2

Pg #: 2-3

Line #: 10 through 33

Code:

Original Specific Comment #: 1

Comment:

The text provides examples of unique soil sample identification numbers that will be used for certification soil samples. The text should be revised to provide samples of the unique identification numbers that will be used for the biased soil samples collected from the floor and sidewalls of the excavation in Section 2.3. The sample locations and identifiers for biased samples should be listed in Appendix B.

Response:

Agree that the text should be updated to include an example of the biased soil samples from the floor and the sidewalls of the excavation. However, since the need to collect a biased sample will be determined in the field, the biased samples will not be included in

Appendix B. The collection of biased samples will be documented in variances to the PSP

as necessary.

Action:

The text in Section 2.3.2 has been updated to include an example of the biased soil samples

from the floor and sidewalls of the excavation.

Commenting Organization: U.S. EPA 2. Section #: 6.0

Pg #: 6-1

Commenter: Saric

Line #: 13 and 14

Code:

Original Specific Comment #: 2

Comment:

The text states that following analysis, any remaining soil will be either sent to the On-Site Disposal Facility (OSDF) if the data shows that the soil is above final remediation levels (FRL) or spread in a certified area if data shows that the soil is below FRL. The material being excavated during removal of the abandoned outfall line is being considered to be above waste acceptance criteria (AWAC) and will be disposed off-site instead of in the OSDF. The text should be revised to state that any remaining soil will be shipped off-site for disposal.

Action:

Response:

This statement is not applicable to Area 9 Phase III and will be deleted from the document.

The last sentence of Section 6.0 has been deleted.

Commenting Organization: U.S. EPA 3.

Commenter: Saric

Section #: 7.0

Pg #: 7-1

Line #: 16

Code:

Original Specific Comment #: 3

Comment:

The text states that samples will be assigned a unique sample number as explained in Section 2.3, and listed in Appendix B. The text in Section 7.0, Section 2.3, and Appendix B should be revised to provide examples of the unique identification numbers that will be used for the biased soil samples collected from the floor and sidewalls of the excavation.

Response:

See response to Comment 1 for Section 2.3 and Appendix B. Section 7.0 will not include examples of the unique identification numbers that will be used for the biased soil samples collected from the floor and sidewalls of the excavation since the examples are listed and

referenced in Section 2.3.2.

Action:

The reference to Section 2.3 found in Section 7.0 has been changed to more specifically

reference Section 2.3.2.

P-3626

RESPONSES TO U.S. AND OHIO ENVIRONMENTAL PROTECTION AGENCY COMMENTS ON CERTIFICATION DESIGN LETTER FOR AREA 9, PHASE III ABANDONED OUTFALL LINE EXCAVATION PLAN PART ONE REVISION B

FERNALD CLOSURE PROJECT FERNALD, OHIO

AUGUST 2004

U.S. DEPARTMENT OF ENERGY

E-5626

RESPONSES TO U.S. ENVIRONMENTAL PROTECTION AGENCY COMMENTS ON CERTIFICATION DESIGN LETTER FOR AREA 9, PHASE III ABANDONED OUTFALL LINE PART ONE REVISION B

SPECIFIC COMMENTS

1. Commenting Organization: U.S. EPA

Section #: 4.3 Pg #: 4-2

Commenter: Saric

Line #: 17 through 25

Code: C

Original Specific Comment #: 1

Comment:

The text discusses the statistical analysis that will be performed to evaluate each certification unit (CU). The text should be revised to clarify how the analytical results from the biased samples collected from the floor and sidewalls of the excavation will be used in the

statistical analysis for each CU.

Response:

Agree.

Action:

The text in Section 4.3 has been changed to include the biased samples collected within each

CU in the statistical analysis.

RESPONSES TO OHIO ENVIRONMENTAL PROTECTION AGENCY COMMENTS ON CERTIFICATION DESIGN LETTER FOR AREA 9, PHASE III ABANDONED OUTFALL LINE - PART ONE **REVISION B**

COMMENTS

Commenting Organization: Ohio EPA 2.

Commenter: OFFO

Section #: General

Pg #:

Line #:

Code: C

Original Comment #: 1

Comment:

It was agreed, in the July 14, 2004 meeting, that Ohio EPA would review the CDL and PSP for Certification Sampling for Area 9 Phase III, even though the certification documents were submitted to the Agencies before predesign and excavation results were completed. In the future. Ohio EPA expects DOE to submit documents following Fernald's regular

program of submittal.

Response: Action:

Agree.

None.

3. Section #: Exec Summary

Commenting Organization: Ohio EPA

Pg #: ES-1

Commenter: OFFO Line #: 21-24

Code: C

Original Comment #: 2

Comment:

Since DOE submitted the CDL and the PSP for Certification Sampling before the remediation of A9PIII Part One even began, it is incorrect for DOE to state that

"DOE anticipates that no further remediation activities are required for this particular area and certification activities may begin." Also, it is known that there is silver in the soils

surrounding MH-180A, and excavation will be necessary. Please correct.

Response:

Action:

This sentence will be rewritten to include a reference to the excavation of the known

above-FRL contamination surrounding MH-180A.

Commenting Organization: Ohio EPA 4.

Pg #:

Commenter: OFFO Line #:

Code: C

Original Comment #: 3

Comment:

Section #: 4.1.

Please add text explaining the addition of sampling location 17 in CU 1.

Response:

Action:

Text will be added describing the addition of sampling location 17 in CU 1 that covers the

excavation of MH-176.

Commenting Organization: Ohio EPA 5.

Commenter: OFFO

Section #: 4.1

Pg #:

Line #:

Code: C

Original Comment #: 4

Comment:

Please add information on the certification sampling of the surface soils surrounding

MH-180A for silver after excavation of these soils.

Response:

Action:

An additional certification unit will be created to cover the limits of surface excavation surrounding MH-180A. Details of the excavation will also be provided in this section.

6. Commenting Organization: Ohio EPA

Commenter: OFFO

Section #: 5.0

Pg #: 5-1

Line #:

Code: C

Original Comment #: 5

Comment:

Please make corrections to the A9PIII schedule.

Response:

Action:

The dates listed in Section 5.0 will be revised to reflect the current schedule.